

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

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UNITED STATES OF AMERICA

vs.

ROBERT ROTHMAN,

Defendant.

Case No. 12-cr-210-1 (DMC)

ORDER

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WHEREAS, this matter having been brought before the Court on the application of Mark D. Harris, Esq., of the law firm of Proskauer Rose LLP, attorneys for Defendant Robert Rothman, for an Order releasing Mr. Rothman's now expired passport and permitting him to apply for a new passport and to travel to Israel at a time and for a duration to be agreed upon by the government and Pretrial Services; and

WHEREAS, counsel for the government, Debra C. Brooks, has no objection to the request, and Stephanie Neri, Mr. Rothman's Pretrial Services Officer, takes no position on the request;

IT IS this 20 day of Nov 2012,

ORDERED that Defendant Robert Rothman's expired passport be returned to him and that he may apply for a new passport, provided that once Mr. Rothman receives the new passport, he will turn both passports over to Pretrial Services, until such time as the new passport is needed for his trip to Israel, and;

IT IS FURTHER ORDERED that Defendant Robert Rothman is hereby permitted to travel to Israel at a time and for a duration to be agreed upon by the government and Pretrial Services.


HON. DENNIS M. CAVANAUGH
UNITED STATES DISTRICT JUDGE



Proskauer Rose LLP Eleven Times Square New York, NY 10036-8299

November 1, 2012

Via Federal Express

Hon. Dennis M. Cavanaugh
United States District Court
District of New Jersey
U.S. Post Office & Courthouse
2 Federal Square, Courtroom 4
Newark, NJ 07101

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Re: United States v. Robert Rothman, 2:12 Cr. 210-1 (DMC)

Dear Judge Cavanaugh:

On behalf of Robert Rothman, we respectfully request that the Court modify the terms of his release to allow his expired passport to be returned to him, so that he may apply for a new one. We also request that the Court grant permission for Mr. Rothman to travel to Israel to visit his son, at a time and for a duration to be agreed upon by the government and Pretrial Services.

On March 27, 2012, Mr. Rothman pled guilty pursuant to a plea agreement to conspiracy to violate the Sherman Act, in violation of 15 U.S.C. § 1. He is scheduled to be sentenced on December 3, 2012. As part of his release, Mr. Rothman's travel is restricted to the continental United States. In addition, Mr. Rothman has surrendered his passport to Pretrial Services and is not permitted to apply for new travel documents. Since his release, Mr. Rothman has complied with all the conditions of his release.

One of Mr. Rothman's sons is spending the 2012-2013 academic year living in Israel and participating in a study-abroad program for college-aged students. With the consent of the government, Mr. Rothman would like to plan a trip to visit his son. Under the regulations, because his passport has now expired, Mr. Rothman needs it back in order to apply for a new one. Once he receives the new passport, he will turn both passports over to Pretrial Services, until such time as it is needed for his trip to Israel. Mr. Rothman will clear any such trip with the government and with Pretrial Services.

We have conferred with counsel for the government, Debra C. Brooks, who does not object to this request. Stephanie Neri of Pretrial Services has informed us that her office, as is its custom, takes no position.

Respectfully submitted,

Mark D. Harris

cc: Debra C. Brooks, USDOJ (by email)
Stephanie Neri, Pretrial Services (by email)